## **Blood-Stream Infection (CDC)**

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Sent: Tuesday, November 24, 2009 2:47 PM

To: Blood-Stream Infection (CDC)

Subject: Suggestions for Changes to 2009 Prevention of CR-BSI Draft (UNCLASSIFIED)
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Classification: UNCLASSIFIED

Caveats: NONE

To whom it may concern, I have reviewed the Draft of the Guidelines for the Prevention of Intravascular Catheter-Related Infections (2009) document and would recommend the following changes:

Line 61 & Line 483

Line 1473: "chlorhexidine impregnated SPONGE dressings"

Comment: The scientific data proves that the Chlorhexidine is the reason for the reduction of infection rate, not the fact that the dressing is specifically made of a "sponge" material. Suggested rewording: "an Occlusive semipermiable absorptive chlorhexadine dressing" or some variation of that wording. (Take out the word Sponge, which makes this document sound as if the CDC is advertising for a specific company that just so happens to have the patent for the only sponge dressing on the market. What is the CDC trying to recommend to the public?, the use of Chlorhexadine or only the use of only Sponges that contain Chlorhexadine. Which is it? What is the intent of the statement? What do you mean by sponge?(absorptive properties, or a specific material construction).

Rationale: I am cornered by the representatives from Johnson and Johnson (Biopatch) and 3M (Tegaderm CHG) on a continual basis and the argument over the word "Sponge" comes up every time as the main point of interpretation as to what the CDC is recommending. I continually try to make sense of your intent and recommendation, but that word, "Sponge", is the hang-up every time. Does the dressing need to be made of an absorptive material, is that what the CDC means to recommend. Both companies have compelling arguments as to why their product is better, but the bottom line is that Chlorhexadine is the commonality, and not the platform on which it is impregnated and immobilized for application.

Lines 488-546: All of the data presented states that Chlorhexadine is the reason for the reduction of infection rates and not the fact that the dressing is a "Sponge" material. Johnson and Johnson has more of a history of supporting data in this section so the use of the word sponge when referring to the studies that used biopatch would not be inappropriate or viewed as an advertisement, but in the general recommendations section (lines 61, 483, 1473, it is not necessary to use the descriptor "sponge", when what you really mean is Chlorhexadine).

## General Comments:

Thank you for taking out the product names that were trademarked and registered items (i.e. Biopatch, Teflon, etc..) as this served to only confuse matters more when attempting to purchase products for our facilities, because we would be mislead by vendors as to the CDC recommendation and our attempts to be compliant.

Along with removing the Registered Product names and Trademarks, it would be nice if you could also remove the specific material references (i.e. Sponges).

Thank you for your consideration on this matter.

## Respectfully,

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Caveats: NONE